



April 11, 2007

BY ELECTRONIC FILING

Enforcement Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: WC Docket No. 05-196 – VOIP E911 Compliance Status Report

To whom it may concern:

Pursuant to your letter dated March 12, 2007, Covad Communications (“Covad”) hereby provides information supplementing its November 28, 2005 VoIP E911 compliance report to the Commission.

1. **Provision of Compliant 911 Service:** Covad currently provides 911 or E911 service in compliance with the Commission’s *VoIP E911 Order*¹ to 99.62% of its interconnected VoIP customers.
2. **911 Coverage:** Stations where 911/E911 coverage compliant with the *VoIP E911 Order* cannot be provisioned are limited to areas where our 911/E911 service vendors lack sufficient numbering resources to provide full E911 functionality at this time. We expect to provide fully compliant services to the remainder of our customers as soon as the capability is made available from our vendors.
3. **911 Routine Information/Connectivity to the Wireline E911 Network:** Pursuant to the foregoing and ¶ 42 of the *VoIP E911 Order*, for its interconnected VoIP customers, Covad transmits all 911 calls to the appropriate Public Safety Answering Point (“PSAP”), designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized. Proper transmission of emergency calls is a high priority item that is verified in the service provisioning and installation process.

¹ *E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking*, 20 FCC Rcd. 10245 (2005) (“*VoIP E911 Order*”).

4. **New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas:**

Covad does not market to or accept new customers in areas where 911/E911 service cannot be provided in full compliance with the Commission's *VoIP E911 Order*. Covad has in place a means to automatically detect requests for interconnected VoIP service in areas where 911/E911 service cannot be provided in compliance with the *VoIP E911 Order* and requests to provision service to those areas is automatically rejected. Covad stopped accepting new interconnected VoIP customers and marketing interconnected VoIP service in such areas as of on or about October 1, 2005.

Please feel free to contact me by e-mail at Angela.Simpson@covad.com or by phone at (202) 220-0409 if you have any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Angela Simpson', with a stylized, looping flourish at the end.

Angela Simpson
Director
Federal Regulatory Affairs

cc: Kathy Berthot, Chief, Spectrum Enforcement Division, EB, ICathy.berthot@fcc.gov
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